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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

MAY 26 1993.
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of the Commission's Rules to
Establish Rules and Policies Pertaining
to a Non-Voice, Non-Geostationary
Mobile-Satellite Service

CC Docket 92-76

REPLY COMMENTS OF SPACE TECHNOLOGY SERVICES INTERNATIONAL

Space Technology Services International ("STSI") hereby submits its reply comments in the above-captioned proceeding.

I. The Commission Should Impose an Affirmative Obligation on Initial Licensees to Coordinate With All Future Licensees

STSI wishes to emphasize to the Federal Communications Commission ("FCC" or "Commission") the need for sufficient and sincere flexibility in the final rules to ensure entry into the service by multiple licensees. STSI understands that the Commission has decided to allow licensees to determine among themselves which modulation technique to employ for their respective systems. STSI does not disagree with this premise. Nevertheless, STSI believes that the Commission should impose upon the initial licensees an express and affirmative obligation to coordinate frequency modulation compatibility with all future entrants in the service, whether those providers utilize CDMA or

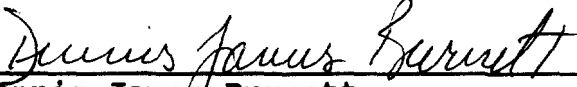
This would allow operators to take advantage of state-of-the-art technology available at the time that an expansion or replacement satellite is to be built, without having to apply for a new or modified license, so long as the new satellite is operationally equivalent to the existing satellites.

IV. Conclusion

STSI reiterates its position that the Commission should explicitly recognize that reciprocity of service access by a significant number of countries will be sine qua non for a healthy NVNG MSS. Consequently, STSI requests the Commission to adopt rules that allow foreign licensed satellite operators to provide NVNG MSS services to U.S. users either directly or through U.S. gateways on a reciprocal basis.

Dated: May 26, 1993

Respectfully submitted,


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CERTIFICATE OF SERVICE

I, Franceska O. Schroeder, hereby certify that the foregoing Reply Comments of Space Technology Services International were served by first-class mail, postage prepaid, this 26th day of May, 1993 on the following parties:

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